

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

SAMUEL LOMBARDO,
Defendant

No. 3:15-CR-286

(Judge)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

**FILED
SCRANTON**

DEC 08 2015

**PER
DEPUTY CLERK**

On or about August 12, 2015, in Luzerne County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

SAMUEL LOMBARDO,

knowingly and intentionally distributed heroin, a Schedule I controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 2

On or about August 13, 2015, in Luzerne County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

SAMUEL LOMBARDO,

knowingly and intentionally distributed heroin, a Schedule I controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 3

On or about August 13, 2015, in Luzerne County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

SAMUEL LOMBARDO,

knowingly and intentionally possessed with the intent to distribute
heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 4

On or about August 13, 2015, in Luzerne County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

SAMUEL LOMBARDO,

knowingly and intentionally carried a firearm, that is, a .25 caliber Armi
Tanfolio semi-automatic handgun, serial number MI93340, during and
in relation to a drug trafficking crime for which he may be prosecuted in
a court of the United States, that is, the unlawful possession with intent
to distribute and distribution of heroin; and knowingly possessed the
above described firearm in furtherance of a drug trafficking crime for
which he may be prosecuted in a court of the United States, that is, the
unlawful possession with intent to distribute and distribution of heroin.
All in violation of 18 U.S.C. § 924(c).

FORFEITURE ALLEGATION

(18 U.S.C. 924(d), 28 U.S.C. 2461 and 21 U.S.C. § 853)

1. The allegations contained in Counts 1 through 4 of this
Indictment are hereby re-alleged and incorporated by reference for the

purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853.

2. Pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 18, United States Code, Section and 924, and Title 21, United States Code, Section 841, the defendant,

SAMUEL LOMBARDO,

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

A .25 caliber Armi Tanfolio semi-automatic handgun, serial number MI933403.

If any of the property described above, as a result of any act or omission of the defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a

third party;


- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and 21 U.S.C. § 853.

A TRUE BILL

A large black rectangular redaction mark covering a signature.

ETG. 12/8/15


PETER J. SMITH
UNITED STATES ATTORNEY

Date: 12-8-15